

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

SHANIKA CROWLEY,

Plaintiff,

v.

FPI MANAGEMENT, INC., and  
ELLEN RICHARDS,

Defendants.

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Case No. 24-cv-00544-CVE-MTS

**JOINT MOTION TO STAY CASE PENDING ARBITRATION**

All parties, by counsel, hereby jointly move the Court to stay the case for parties to pursue arbitration in accord with a valid, mutually enforceable arbitration agreement entered into between parties. In support of this Joint Motion to Stay, the parties state the following:

1. Plaintiff filed her operative Amended Complaint on January 17, 2025. ECF No. 21.
2. No responsive pleading has been filed, as the Court has granted three previous Motions for Extensions of Time ECF Nos. 30, 35, 37. The current deadline for Defendants to file a responsive pleading is May 23, 2025.
3. No Scheduling Order has been entered in the case.
4. Ms. Crowley and FPI Management, Inc. ("FPI") entered into an agreement ("Arbitration Agreement") on April 18, 2023, to resolve by arbitration all claims, disputes, or controversies arising out of her employment and/or termination.
5. Counsel for both Defendants and Plaintiff have reviewed the Arbitration Agreement and stipulate that the Agreement was entered into voluntarily and knowingly by their respective clients, the Agreement is valid on its face, and the claims that are the subject of this above-captioned action are within the scope of the claims to be arbitrated under the Agreement.

6. Pursuant to the provisions of the Federal Arbitration Act, the parties jointly move for a stay of the instant case pending arbitration. 9 U.S.C. § 3.

7. Counsel will jointly update the Court on the status of proceedings within 120 days of the stay being entered, unless the Court directs otherwise.

8. Parties file this joint Motion to evidence their unanimous consent on the issue of arbitrability. However, the parties stand ready to further brief the matter if so ordered by the Court.<sup>1</sup>

9. A proposed order has been submitted for the Court's consideration.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court grant this Joint Motion to Stay Case Pending Arbitration; enter an order staying the case; and withdraw any further deadlines in this case.

Dated: May 21, 2025

Respectfully submitted,

FPI MANAGEMENT, INC.  
ELLEN RICHARDS

/s/ Brooks Cain  
Brooks Cain (OK Bar No. 35568)  
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*Counsel for Defendants*

SHANIKA CROWLEY

/s/ Emanuel Kataev  
Emanuel Kataev, Esq. (*pro hac vice*)  
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<sup>1</sup> Parties are prepared to provide the Court with a copy of the executed Arbitration Agreement at the Court's request.

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